

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590**

US EPA RECORDS CENTER REGION 5



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REPLY TO THE ATTENTION OF:

SE-5J

DATE: 12 November 1998

SUBJECT: Preliminary Site Assessment and Conduct of Multi-media Sampling at the Cometco (a Cozzi Iron & Metals Site) Facility, Chicago, Cook County, Illinois

FROM: Paul R. Steadman, OSC *[Signature]*
Oil Planning & Response Section

TO: Beverly J. Kush, Chief
Oil Planning & Response Section

Sherry Estes, Asst. Reg. 5 Counsel
Office of Regional Counsel

On Tuesday, November 10, 1998, representatives of this agency's Waste, Pesticides and Toxics Division, its Water Division, and the Division of Superfund representing both CERCLA and OPA interests met at the subject facility to commence a scheduled preliminary site assessment including multi-media sample gathering at 0900H. The Toxics Division was represented by Ken Zolnierczyk, the Water Division was represented by Howard Duckman, and I fulfilled the interests of Superfund and the Oil Pollution Act. The interests of RCRA compliance were overseen by Mr. Gino Bruni of the Illinois EPA but no one from the federal program participated in this site assessment and multi-media analytical sampling initiative. During the planning phase on Friday, November 6, 1998, for this facility visitation the interests of RCRA at this Site were emphasized as first and foremost, so much so that there was an initial commitment for monetary resources to cover the costs of the sample analysis and monitoring since that program already had a certified laboratory in place and under contract for such analytical procedures. Ultimately, the financial burden for this became shifted to Superfund to cover the expenditures, and our START contractors from Ecology and Environment undertook the identification of a laboratory for the environmental sample analyses of all media derived from the Cometco facility.

Mr. Mark LaRose and Mr. Frank DiVito, the attorneys representing Cozzi Iron and Metals Company, and Ms. Debra Levin, Cozzi's Environmental Compliance Officer, met with us initially to discuss our plans to sample, photograph and inspect the facility. We were accompanied throughout this day long site assessment work by Mr. LaRose and Ms. Levin.

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They requested that they be supplied with split samples of all media EPA took from this Site for laboratory identification and concentration determination. Likewise they took photographs at and from the same locations that we took pictures from, and they made continuous and copious notations of all of our field activities, questions posed, and comments made. Mr. Duckman of the Water Division was able to obtain a boat with the assistance of the Metropolitan Water Reclamation District which facilitated our ability to photograph and try to sample the facility from the east side edge of the site on the Chicago River.

I asked Mr. LaRose and Ms. Levin for information concerning frequency of pumping and any analytical data regarding the contents of the on-site settling pond. They confirmed that the contents of this pond are pumped out, based on the weather and precipitation accumulation, at least three times annually and the waste hauler conducts analysis of the material from the pond prior to its disposal. I told them that we may request copies of these records and data at a later date. Too, since both of these alluded to some previous "overflows" from the pond, I asked them to assure that the pumping frequency from this pond be increased to assure that no instances of such discharges occur hereinafter. As well, I asked them to increase the height by approximately of the berm on the eastern side of the facility along the river's edge as an additional measure to reduce the potential of hazardous constituent overflow from the facility. This recommendation was made in response to the company's installation of temporary boom materials in this location.

A site debriefing meeting was held at the termination of the assessment and sampling program. I made it clear that additional corrective action may be forthcoming from the U.S. EPA based on that which the analytical sampling data indicates. A full report including sample data validation will be available within thirty days of this initial site investigation report.